UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION

This document relates to: All Cases.

MASTER DOCKET

18-md-2865 (LAK)

MEMOENDORSED

MOTION FOR ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE TO OBTAIN EVIDENCE IN THE BRITISH VIRGIN ISLANDS

PLEASE TAKE NOTICE that the undersigned attorneys for the plaintiff
SKATTEFORVALTNINGEN ("SKAT"), the Customs and Tax Administration of the Kingdom
of Denmark, will apply before the Honorable Lewis A. Kaplan of the Southern District of New
York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York,
New York, 10007, at a time and date to be determined by the Court, for the issuance of a Request
for International Judicial Assistance Pursuant to the Evidence (Proceedings in Foreign
Jurisdictions) Ordinance, Cap. 24 (Oct. 1, 1988) (Virgin Is.). In support of this motion, SKAT
relies upon the accompanying Memorandum of Law and Declaration of Neil J. Oxford dated
April 27, 2020 and the exhibits attached thereto.